

TAB "E"

EXCERPTS FROM JILL SEYLER DEPOSITION

1 February of 2000." First of all, do you remember
2 making that statement in this interview on June
3 17th, 2003?

4 A. I don't remember it.

5 Q. Did Larry --

6 A. I'm not specific about the date.

7 Q. Okay. You do recall though that Larry pursued
8 you when you first started working in
9 engineering?

10 A. Yes.

11 Q. Okay. And what did you mean by that? What do
12 you mean he pursued you?

13 A. He gave me compliments.

14 Q. Can you explain?

15 A. Told me I was pretty and my hair glowed. That
16 kind of thing.

17 Q. Did you find it unusual for him to make these
18 statements to you? I mean were other men making
19 the same kind of statements to you?

20

21 MS. COCHENOUR: Objection as to
22 form, use of the word unusual.

23

24 BY MR. LINDSAY:

25 Q. Why don't we restart that question? First of

1 all, did Larry Meade work in the same department
2 as you did?

3 A. No.

4 Q. Did he work in the same part of building as you
5 did?

6 A. No.

7 Q. Okay. Where were these comments made?

8 A. At my desk.

9 Q. How often did he come to your desk during this
10 period of time we're talking about?

11 A. I can't recall.

12 Q. Was it several times a week?

13 A. I would say yes.

14 Q. And was there, do you know of any reason that he
15 would be there other than to see you?

16 A. I wouldn't know.

17 Q. You know of no other reason?

18 A. No.

19 Q. Okay. It says next here, "He would stop at my
20 desk and tell me I was wonderful and things like
21 that," which I think you've testified to,
22 correct?

23 A. I don't recall saying that then.

24 Q. Well, did he stop by your desk and tell you you
25 were wonderful, things like that?

1 A. Specifically wonderful, I don't remember.

2 Q. Okay. How did you first get to know Larry Meade?

3 A. Just from him stopping by and talking.

4 Q. Okay. It says next, "I just kind of laughed it
5 off." Is that what you did?

6 A. Uh-huh. Yes.

7 Q. Okay. Then it says, "Got to be fairly obnoxious
8 and I mentioned to Deb" -- is it Crise or Chris?

9 A. Crise.

10 Q. -- "Crise I was going to go to HR the next time
11 he did it." Okay. Now, do you remember having
12 that conversation with Deb Crise?

13 A. Yes.

14 Q. Can you tell me where that conversation was?

15 A. In our office.

16 Q. Okay. What led you to have this conversation
17 with Deb Crise?

18 A. I felt I wanted him to stop stopping at my desk.
19 I -- that's it.

20 Q. Why did you want him to stop stopping at your
21 desk?

22 A. I had work to do. I was probably getting
23 annoyed.

24 Q. Who was getting annoyed?

25 A. I was.

1 Q. All right. Okay. Did you tell him that you were
2 getting annoyed, Larry Meade?

3 A. No.

4 Q. You said that you were going to go to HR the next
5 time he did it; is that correct? Is that what
6 you said to Deb Crise?

7 A. Yes.

8 Q. What were you going to go to HR about?

9 A. To seek help in getting him to stop stopping at
10 my desk.

11 Q. Okay. Did you go to HR?

12 A. No.

13 Q. Is there a reason you did not?

14 A. He never stopped at my desk again.

15 Q. Okay. That's after you talked to Deb Crise?

16 A. Yes.

17 Q. Then it says, "He was a married man and I thought
18 he was being a jackass." Is -- first of all, do
19 you remember saying that to --

20 A. Yes.

21 Q. All right. What did you mean, "He was a married
22 man and I thought he was being a jackass"? What
23 did that mean when you said that?

24 A. I thought he was behaving foolishly.

25 Q. Why? Did it appear to you that he was, as we'd

1 say, coming on to you? Do you understand what I
2 mean? He's a married man, correct?

3 A. (Witness nods head affirmatively.)

4 Q. You're nodding?

5 A. I'm sorry.

6 Q. That's okay. We all do it. So my question is is
7 when you say he was a married man and he was
8 being a jackass, isn't that in reference to the
9 fact he's a married man and he appeared to, as
10 we'd say, come on to you or making, showing some
11 attraction to you? Is that what you meant?

12 A. I would just say overly flirtatious.

13 Q. Okay. It says, "Didn't get emotionally involved
14 and didn't bring me to the point of being
15 terrible upset or anything." Is that true?

16 A. That's correct.

17 Q. And then it says, "It was an annoyance, a
18 nuisance;" is that correct?

19 A. Yes.

20 Q. Okay. And then it says, "It stopped so abruptly
21 I assumed that Deb Crise talked to him;" is that
22 correct?

23 A. That's correct.

24 Q. Did Deb Crise talk to him, do you know?

25 A. I do not.

1 Q. And then it says, "I'd been telling him to knock
2 it off, cut it out. Oh, Larry, give it up. It's
3 not working. Just go away." And did --

4 A. I don't recall making that statement.

5 Q. Okay. Then you have here in the statement, "I
6 think he pursued Val much more intensely than he
7 did me." Is that what you said to Mr. Maritz and
8 Miss Kemick?

9 A. I don't recall making that statement.

10 Q. Do you think he did pursue Val much more
11 intensely than he did you?

12 A. I have no way of knowing.

13 Q. Then you say, "He has a reputation at this
14 company. He thinks he's quite the guy." Did you
15 say that?

16 A. I don't recall saying that.

17 Q. Does he have a reputation at the company?

18 A. I don't know.

19 Q. Well, have you heard things about him?

20 A. Yes.

21 Q. Okay. What have you heard?

22 A. To be honest, it was just from the cafeteria
23 ladies.

24 Q. What did you hear from the cafeteria ladies?

25 A. That he would come down and talk to them and they

1 wished he wouldn't.

2 Q. Did they tell you why they wished he wouldn't?

3 A. No.

4 Q. Did you know why they wished he wouldn't?

5 A. No.

6 Q. Okay. Is there anything else you knew about his
7 reputation other than what was told to you by the
8 cafeteria ladies?

9 A. No.

10 Q. Next there's a, "JM", which I think is reference
11 to Mr. Maritz.

12 "JM How many times did this happen?" And
13 then it has,

14 "JS", Jill Seyler, "Kind of consistently.
15 It was daily for at least a month probably." Is
16 that correct that it --

17 A. I don't recall at this point whether it was
18 daily.

19 Q. Okay. Answer, "So it didn't happen just once or
20 twice?

21 JS No. He kept it up for quite a while."
22 Is that true, that it didn't just happen once or
23 twice, he kept it up for quite a while?

24 A. It's true that it didn't just happen once or
25 twice. As far as quite a while, that's a -- it's

1 tough for me to say now whether it was quite a
2 while or just a couple weeks or something.

3 Q. Okay. Then it has,

4 "JM Kept it up after you told him to knock
5 it off?

6 JS I tried to be kind, didn't want to hurt
7 his feelings. Didn't feel it was necessary to
8 treat him badly, but it was getting to that
9 point. Actually, it was laughable because he
10 thinks he is such a sexy thing."

11 Okay. Was that true?

12

13 MS. COCHENOUR: I'm sorry. I don't
14 understand the question. Is it true that
15 she made those statements?

16

17 BY MR. LINDSAY:

18 Q. Well, no. Is it true that you tried to be kind?
19 You didn't want to hurt his feelings, didn't feel
20 it was necessary to treat him badly, but it was
21 getting to that point. Actually it was laughable
22 because he thinks he's such a sexy thing. Is
23 that true?

24 A. Parts of that are true.

25 Q. Are true? What parts are true?

1 A. It was laughable. That was -- to me it was
2 laughable. That was true. As far as whether or
3 not he really thinks he's a sexy thing, I don't
4 know. What else did you say?

5 Q. You said you thought it was laughable, correct?

6 A. Yes.

7 Q. Why did you think it was laughable?

8 A. I tend to think any man paying me compliments and
9 flirting with me is fairly laughable.

10 Q. Why is that?

11 A. I don't feel I warrant that kind of interest.

12 Q. Next it has here, "Stared into my eyes and said
13 he could read my thoughts." Did you say that to
14 Johan Maritz and Diane Kemick?

15 A. Yes.

16 Q. Did Mr. Meade stare into your eyes and say he
17 could read your thoughts?

18 A. Yes.

19 Q. On more than one occasion?

20 A. No, just once.

21 Q. Tell us the circumstances of that occasion, if
22 you would?

23 A. He was standing in front of my desk. I was
24 working. He said it.

25 Q. Okay. And then it says, "The girls in the

1 cafeteria complained about him." Is that what
2 you said to Mr. Maritz?

3 A. I don't remember if I used the word complained.
4 I know they talked to me about him.

5 Q. Okay. How often did they talk to you about him?

6 A. Just once.

7 Q. What led you to talk to the ladies in the
8 cafeteria about Mr. Meade?

9 A. At the time it was probably just my feelings
10 about his treatment of me.

11 Q. What were your feelings?

12 A. I'm surely there were, it was a mixture of
13 feelings.

14 Q. Can you try to describe them for us?

15 A. Initially I was flattered and as it went on I
16 grew to not enjoy it as much. And eventually I
17 got to the place where I would have felt better
18 if he had just said hi and, you know, just keep
19 things normal and go on.

20 Q. Okay. Why did you change your opinion as time
21 went on?

22 A. Like I said, I was very busy, lots of work to do,
23 no interest in him.

24 Q. When you say no interest in him, what do you
25 mean? I'm sorry. I have to ask you these

1 questions. Did that mean that you didn't have
2 any romantic interest in him; is that what you
3 meant?

4 A. Yes.

5 Q. Okay. Now, you also say with regard to the girls
6 in the cafeteria, this is what's stated in here,
7 "He would massage their shoulders, gave them all
8 kinds of attention they didn't want." Now, do
9 you recall telling that to Mr. Maritz and
10 Ms. Kemick?

11 A. No. I recall talking about what the cafeteria
12 ladies said, but I don't recall specifically
13 using those words.

14 Q. What do you recall saying?

15 A. Verbatim, I can't tell you what I -- because I
16 don't recall.

17 Q. I'm not asking you to say verbatim. Do you
18 recall anything that you said to them about what
19 the cafeteria ladies said?

20 A. I recall saying that the cafeteria ladies were
21 getting attention from Larry that they didn't
22 want and that's about it.

23 Q. It says here that you were, that they're
24 referring to Dora and possibly Flo. Are those
25 the two cafeteria ladies that you -- are those

1 the cafeteria ladies you were talking about?

2 A. The name Dora sounds right. I don't know that I
3 ever knew the name of the other one.

4 Q. Okay. Then it has, there's a, "DK", which I
5 presume was Diane Kemick.

6 "DK Did he ever touch you?"

7 JS Yes. Not exactly inappropriately. He
8 would come up beside me, put his hand on my back,
9 or around my waist."

10 Now, did that happen?

11 A. I recall one instance where he placed his hand
12 kind of in the middle of my back.

13 Q. What were the circumstances of him doing that?

14 A. I was walking out the office to go on an errand
15 and he was walking beside me.

16 Q. And did that make you feel uncomfortable?

17 A. No.

18 Q. Was it unwelcomed?

19 A. No.

20 Q. All right. Here's what is written here after
21 that, "Didn't consider it a sexual advancement,
22 but it wasn't welcome. Didn't encourage him."

23 Is that what you said to Mr. Maritz.

24 A. I don't remember.

25 Q. Okay. Does that refresh your recollection about

1 the actual incident?

2 A. No. No.

3 Q. Then it says this, "Some of the stuff he said was
4 really inappropriate. He would talk about his
5 wife. Really has this distorted image of
6 himself." Did you say that?

7 A. Again, I don't recall verbatim if I said it, but
8 I may have.

9 Q. Okay. If you did, what did you mean by it? In
10 other words, some of the stuff he said was really
11 inappropriate. He would talk about his wife.
12 What did you mean? What do you remember him
13 doing?

14 A. I remember him once or twice making negative
15 comments.

16 Q. Such as what?

17 A. I can't recall specifically.

18 Q. Okay. "Really has this distorted image of
19 himself." Did you say something like that?

20 A. I don't know. I mean, I don't recall saying
21 that.

22 Q. Do you think he had a distorted image of
23 himself?

24 A. I have no way of knowing.

25 Q. Then it says,

1 "JM Did he ever contact you outside of
2 work?

3 JS Called my house one day."

4 Do you recall that?

5 A. Yes.

6 Q. Why don't you tell us what happened?

7 A. I wasn't there.

8 Q. Okay. How do you know about the call?

9 A. My daughter told me.

10 Q. What did she tell you?

11 A. That she answered the phone and someone made a
12 comment. My daughter, as I recall, said that the
13 person calling said, "Did I make you sick?" And
14 she said, "Who is this?" And then the caller
15 asked for me and she said, "She's not home."

16 Q. You think it was Larry Meade that called?

17 A. He admitted it.

18 Q. Did you have a conversation with him about
19 calling? I'm asking you how did he admit it?

20 A. I must have, I questioned him about it the next
21 day at work.

22 Q. Then it has,

23 "JM Ever make suggestions about going away
24 together?"

25 JS Kind of like let's jump in the car and

1 go where life takes us, that type of thing."

2 Do you recall Mr. Meade making statements to you
3 like that?

4 A. Yes. Just once.

5 Q. What do you recall about that?

6 A. That one day he made the comment about the
7 highway, life's highway or something, and taking
8 off.

9 Q. Then it says, "Jill told us that Dan Blauser was
10 aware of what was going on." Do you know a Dan
11 Blauser?

12 A. Yes.

13 Q. Who was Dan Blauser?

14 A. He was my boss.

15 Q. Okay. What did he know?

16 A. That, I mentioned to Dan just in passing on maybe
17 a couple of occasions that I was getting
18 attention from Larry and it was kind of
19 laughable.

20 Q. Did you tell him what kind of attention you were
21 getting?

22 A. Not specifically.

23 Q. Did you tell him that it bothered you and annoyed
24 you?

25 A. I think I indicated to him that I wasn't enjoying

1 it.

2 Q. Mrs Seyler, did you report any of this conduct of
3 Larry Meade, that you indicated you were not
4 enjoying, to HR?

5 A. No.

6 Q. You reported it to your supervisor though; is
7 that correct?

8 A. I didn't report it so much as I just mentioned it
9 in passing.

10 Q. Why didn't you report it?

11 A. It wasn't that big a deal.

12 Q. That's why?

13 A. Uh-huh.

14 Q. You seem to be very nervous here today; is that
15 correct?

16

17 MS. COCHENOUR: Objection.

18 MR. LINDSAY: You're instructing
19 her not to answer that question?

20 MS. COCHENOUR: I didn't say that.
21 I'm just objecting to the form of the
22 question. What's wrong with the form?

23

24 BY MR. LINDSAY:

25 Q. Are you nervous today, ma'am?